

## DEFENDANTS' OBJECTIONS TO DYM KAR FEES

Date of service	Page # / Line #	Described service provided	Hours expended	Basis for Objection
2/15/2012	1 /22	Review criminal records of Pleas, Jones, Smith, Lewis	1	Plaintiffs in civil suit 11 C 7718 settled by counsel for same incident
2/15/2012	1/26-29	Telephone conferences with Pleas, Lewis, Jones, Smith	1.2	Plaintiffs in civil suit 11 C 7718settled by counsel for same incident
4/20/2012	2/26	Review answer from City	0.3	Monell-related; claim dismissed
6/18/2012	2/46	Review answer to amended complaint	0.3	Monell – related; claim dismissed
7/5/2012	2/50	Telephone call to courtroom deputy	0.2	Unnecessary
7/26/2012	3/5	Conf. with attorney G Yamin	0.4	Monell – related; claim dismissed
10/3/2012	3/9	Review def motion to compel	0.4	Motion to compel filed because Plaintiffs had not responded to written discovery requests; Issue created by counsel
10/4/2012	3/10	Review def motion to withdraw and determine def representation	0.1	Unnecessary
10/16/2012	3/13	Telephone conf with Court Deputy	0.2	Unnecessary
10/16/2012	3/16	Draft response to motion to compel	1.1	Issue created by counsel by not responding to written discovery requests
10/17/2012	3/19	Review attorney appearances (3) and correlating with defendants	0.1	Unnecessary
11/1/2012	3/26	Telephone conf with attorney Vanorney	0.3	Monell – related; claim dismissed
11/4/2012	3/27	Review email from attorney Yamin	0.1	Monell – related; claim dismissed
11/26/2012	3/39	Telephone conf with attorney Cook	0.1	Unnecessary
11/26/2012	3/40	Telephone conf with attorney Vanorney	0.1	Monell – related; claim dismissed
1/2/2013	3/46	Review def Motion to Compel	0.3	Monell – related; claim dismissed; Issue created by counsel
1/6/2013	3/47-49	Draft notice and motion to reset and email def attorneys	0.7	Monell – related; claim dismissed

1/7/2013	3/50	Review court order	0.1	Monell – related; claim dismissed; related to counsel's motion
1/9/2013	3/51	Review court order	0.1	Monell – related; claim dismissed
1/10/2013	3/52	Review motion to withdraw	0.1	Unnecessary
1/13/2013	4/2-12		3.4	Monell – related; claim dismissed; related to defense Motion to Compel P on Monell discovery
1/31/2013 – 2/1/2013	4/14-16	Telephone calls and emails with court deputy	0.6	Unnecessary
2/21/2013	4/31	Review def Motion to Compel	0.3	Motion to Compel Plaintiffs' depositions; issue created by counsel
2/22/2013	4/33-34	Draft notice and motion to reset	0.6	Related to motion to compel Plaintiff's depositions; issue created by counsel
2/22/2013	4/40	Draft K. Thornton subpoena	0.2	Unnecessary work created by counsel when she knew Keith Thornton was residing out of the state in California
2/26/2013	4/46-47	Draft Notice and Motion to Stay Discovery	0.6	Counsel's motion to stay discovery
2/28/2013	5/2,3,5,6	Depositions of Graney, Mangan, Garcia, Gorzkowski	4.8	Defendants dismissed by Plaintiffs with each side bearing its own costs and fees
3/15/2013	5/20	Draft RTP	1.7	Discovery stayed on counsel's motion
3/18/2013	5/21	Telephone conf	0.3	Discovery stayed on counsel's motion
4/23/2013	5/22-25	Emails with defense counsel / file review	0.9	Discovery stayed on counsel's motion
4/25,26, 29/2013	5/26-20	Communication with defense counsel	0.5	Discovery stayed on counsel's motion
4/30/2013	5/30-32	Discovery review and drafting motion to compel	2.3	Discovery stayed on counsel's motion
5/1-2/2013	5/34-36	Legal research / draft motion to compel	6	Related to discovery issues while discovery was stayed on counsel's motion

5/2/2013	5/37-38	Keith Thornton correspondence	0.6	Discovery violation by counsel as never produced
5/3/2013	5/39	Review defendants' response to Motion to Compel	0.4	Unnecessary work created by Plaintiffs
5/4/2013	5/42	Review FOIA request responses	2.1	Discovery violation – documents never produced; improper means of obtaining records during pending litigation if related to litigation. If not related to litigation not recoverable.
5/4-5/5/2013	5/43,44,46	Emails with Keith Thornton	0.6	Discovery violation – documents never produced
5/6/2013	5/48,49	Statement for Keith Thornton deposition	0.4	No service of the subpoena for deposition was obtained on Keith Thornton; thus, counsel knew that Keith Thornton would not show for deposition. Additionally, at that time, counsel was aware Keith Thornton was residing in California; discovery issue created by counsel
5/19/2013	6/27-29	Motion to compel and request to admit	4.1	Plaintiffs did not prevail on the majority of these issues
5/19/2013	6/30	Email to Keith Thornton	0.3	Discovery violation – document never produced
5/22-23/13	6/32-34	Motions and notice of motion	0.7	Related to motions that Plaintiffs did not prevail upon
5/27/2013	6/36	Email to Keith Thornton	0.2	Discovery violation – document never produced
5/30/2013	6/44-46	Motion for rule to show cause	3.7	Motion denied; Court instructed counsel it was sloppy
5/31/2013	6/47	Telephone call to court t deputy	0.1	Unnecessary
5/31/2013	6/50	Motion hearing on rule to show cause	1.7	Unsuccessfully motion
5/31/2013	7/1	Telephone conf with Court Deputy	0.1	Unnecessary
5/31/2013	7/2	Letter to multiple witnesses	0.8	Discovery violation – never produced
6/3/2013	7/12	Email to Keith Thornton	0.2	Discovery violation – never produced

6/4/2018	7/13	Draft re-notice of motion	0.1	Motion denied
6/4/2013	7/14	Letter to five witnesses	1.0	Documents never produced
6/6/2013	7/20	Email to Keith Thornton	0.1	Never produced
6/6/2013	7/21	Email to 2 court deputies	0.1	Unnecessary
6/6/2013	7/22-24	Motion for protective order and quashing dep notice	2.8	Related to deposition of Keith Thornton; Unnecessary and baseless motion and issue created by counsel because counsel knew Keith Thornton had not been served with the subpoena for deposition counsel earlier issued
6/6/2013	7/25	Telephone conference with court deputy	0.1	Unnecessary
6/7/2013	7/30	Hearing on emergency motion	1.0	Motion denied. Additionally, related to deposition of Keith Thornton; unnecessary and baseless motion
6/7/2013	7/31	Telephone conference with court deputy	0.2	Unnecessary
6/7/2013	7/32,34	Draft re-notice of motion	0.2	Motions denied
6/7/2013	7/33	Hearing on emergency motion	0.9	Motion denied
6/7/2013	7/35	Review Court orders	0.1	Motions denied
6/12/2013	7/41	Review Court Order	0.2	Motion denied
6/12/2013	7/42	Prepare for motion hearing	0.8	Motion denied; vague entry; excessive time
6/12/2013	7/43	Motion hearing	1.4	Motion denied
6/15/2013	8/2-7	Drafting multiple motions	4.0	Motions denied
6/19/2013	8/9-12	Preparation and hearing on multiple motions; review court orders	3.2	Plaintiffs' motions denied; defendants motion granted
6/20/2013	8/13	Review notice of motion	0.1	Motion denied
6/25/2013	8/24	Review Court order	0.1	Motion denied
7/5/2013	8/40	Review defendants' motion to bar witnesses	0.8	Unnecessary motion practice. Counsel previously represented witnesses and billing records reveal counsel had contact with these witnesses. However, defendants were unable to serve these witnesses and counsel later (i) represented some at their

				respective deposition and (ii) listed all on Plaintiffs' witness list at trial
7/5/2013	8/41	Review defendants' motion to stay financial disclosures	0.7	Defendants' motion granted; Unnecessary as Plaintiffs ultimately traded costs for punitives at trial
7/8/2013	8/43	Telephone conference with court deputy	0.1	Unnecessary
7/11/2013	8/56	Draft response to motion for more than ten depositions	2.2	Counsel unnecessarily objected to this motion and then listed these individuals as trial witnesses on the pre-trial order
7/11/2013	8/57	Draft response to motion to bar witnesses	3.8	Defendants' motion based on inability to serve witnesses Plaintiffs' counsel (i) had contact and access to, (ii) represented some at depositions, and (iii) listed all on Plaintiffs' witness list at trial.
7/11/2013	8/58	Draft response to motion to stay financial disclosures	1.9	Defendants' motion granted; Unnecessary as Plaintiffs ultimately traded costs for punitives
7/16/2013	9/19	Review reply to response to motion for more than ten depositions	0.4	Counsel unnecessarily objected to this motion and then listed these individuals as trial witnesses
7/17/2013	9/27	Telephone conf. With court deputy	0.2	Unnecessary
8/16/2013	10/11	Review defendants motion to compel	0.5	Motion to compel depositions of witnesses disclosed by Plaintiff that were the subject of the motion to bar. Defendants' motion to bar was based on inability to serve witnesses Plaintiffs' counsel (i) had contact and access to, (ii) represented some at depositions, and (iii) listed all on Plaintiffs' witness list at trial.
8/20/2013	10/14-15	Multiple emails to court and defense	0.4	Unnecessary
8/22/2013	10/18	Draft response to motion to compel	3.3	Motion to compel depositions of witnesses disclosed by Plaintiff that were the subject of the motion to bar. Defendants' motion to bar was based on inability to serve witnesses

				Plaintiffs' counsel (i) had contact and access to, (ii) represented some at depositions, and (iii) listed all on Plaintiffs' witness list at trial.
8/23/2013	10/25	Telephone conf. With LeCharn Lewis	0.5	One of witnesses that was subject of Motion to compel / bar. Defendants' motion to bar was based in part on inability to serve witness LeCharn Lewis. Plaintiffs' counsel (i) had contact and access to Mr. Lewis, (ii) represented Mr. Lewis at his deposition, and (iii) listed Mr. Lewis on Plaintiffs' witness list at trial.
9/12/2013	10/40-41	Draft letter to witnesses LeSharn Lewis and Shawn Smith	0.2	Witnesses that were subjects of Motions to compel and bar. Defendants' motion to bar was based in part on inability to serve witness LeCharn Lewis. Plaintiffs' counsel (i) had contact and access to Mr. Lewis, (ii) represented Mr. Lewis at his deposition, and (iii) listed Mr. Lewis on Plaintiffs' witness list at trial.
9/16/2013	10/48	Telephone conf with witness Shawn Smith's other	0.2	One of the witnesses that was the subject of the motion to compel / bar. Defendants' motion to bar was based in part on inability to serve witness Shawn Smith. Plaintiffs' counsel (i) had contact and access to Mr. Smith, (ii) represented Mr. Smith at his deposition, and (iii) listed Mr. Smith on Plaintiffs' witness list at trial.
9/24/2013	11/8-9	Conference with LeCharn Lewis and review of his criminal history	1.3	One of the witnesses that was the subject of Defendants' motion to compel / motion to bar and was Plaintiffs' counsel's client in this case as well as in related resolved lawsuit. Counsel contributed to the delay and wasted litigation to have this witness deposed. Unnecessary review of his criminal history

				and previously billed for 2/15/12. Unnecessary conference as Mr. Lewis did not have relevant information regarding Plaintiffs' claims in this case.
9/25/2013	11/16-17	Conference / deposition of LeCharn Lewis	2.1	One of the witnesses that was the subject of the motion to compel / motion to bar and was Plaintiffs' counsel's client in this case and in related resolved lawsuit. Counsel contributed to the delay and wasted litigation to have this witness deposed. Unnecessary – Mr. Lewis did not have information relevant to Plaintiffs' claims in this case.
9/30-10/1/2013	11/21-23	Motion to compel	2.2	Motion stricken by court
10/3/2013	11/27	Review motion to withdraw	0.1	Unnecessary
10/16/2013	11/36	Draft letter to witness Shawn Smith	0.2	Witness subject of Motion to compel / bar; correspondence never produced despite counsel's assertions that she did not represent Mr. Smith at the time Defendants were attempting to serve Mr. Smith.
10/21/2013	11/39-40	Draft. Motion to extend	0.6	Unnecessary
11/1/2013	11-48-50	Phone calls and letters to LAPD	0.7	Related to witness Keith Thornton; materials never produced in discovery
11/21/2013	12/16-17	Draft motion to strike defendants rule 56.1 statement of facts	0.7	Unnecessary; motion denied
12/4-12/6/2013	12/38-41	Review defendants response to motion to strike; draft reply to response to motion to strike	1.6	Motion denied
	13/1, 2, 10, 15, 20, 23, 25, 32, 33, 34, 51		14.5 hours	Vague, redundant, unnecessary billing entries – telephone conferences with deputy, "transcript reviews", unnecessary motions to extend
5/5/2014	14/14-15	Draft notice and motion to strike	1.2	Unsuccessful motion
10/2/2014	14/30-31	Emails with court deputy	0.2 hours	Unnecessary emails

10/2/2014-7/6/2015	14/33, 34, 35, 37, 38, 39-45	Review of order, motion to reconsider	11.9 hours	Vague billing entries "further review of order", unnecessary repetitive work, Motion to reconsider denied
9/10/2015	15/4	Conference with attorney Hamilton	0.5	Attorney Hamilton did not file an appearance on this case until 1/20/2016
9/16/2015	15/5	Phone call with court deputy	0.2	Unnecessary
9/18/2015; 10/6/2015 10/9/2015; 10/12/2015	15/19, 27, 34, 41	Emails and conferences with Attorney Hamilton	1.0	Attorney Hamilton did not file an appearance on this case until 1/20/2016
10/12 -13/2015	15/42, 43, 46, 47	Draft motions in limine	11.2	Motions denied
10/15, 27/2015; 11/18/2015	16/12, 17, 38, 39	Emails and conferences with Attorney Hamilton	1.0	Attorney Hamilton did not file an appearance on this case until 1/20/2016
10/19, 21, 22/2015	16/14, 15, 16	Multiple "Review of Court order"	0.3	Excessive, unnecessary, duplicative, vague
11/9/2015	16/25, 26	Draft notice and motion to strike	1.2	Motion denied
	17/5, 8, 14, 16, 17, 21, 26-29, 32, 34-35, 38, 40-41	Multiple "Review of Court Order"	3.3	Excessive, unnecessary, duplicative, vague
	17 /6, 12, 24,	Multiple conferences or telephone calls with Attorney Hamilton	0.6	Attorney Hamilton did not file an appearance on this case until 1/20/2016; excessive, unnecessary
	17/6, 49, 50	Multiple telephone calls or emails with Court Deputy	0.3	Excessive, unnecessary, vague
3/23/2016	17/23-24	Draft notice and motion to set aside	2.4	Motion denied
6/30/2016	17/36	Draft email to Brian Orozco	0.1	Unnecessary, vague, unrelated to this case. Mr. Orozco has never been counsel of record in this civil action.
8/17/2016	18/2	Motion for referral to resolve audiotape issue	1.4	Motion to resolve issue lost in part
8/18/2016	18/4, 5	Telephone calls with court deputy and ACC Vanorney	0.5	Unnecessary, vague, as to Vanorney, Monell claims had been dismissed



8/18/2016	18/9, 13, 14, 21, 24, 25, 28, 37, 40, 46,	Multiple "review court order"	1.4	Unnecessary, vague, excessive
8/18/2016	18/10	Review motion to withdraw	0.1	Unnecessary
	18/12, 20, 32, 36, 42, 47	Multiple conferences and emails with co-counsel	3.3	Excessive, vague, unnecessary
8/18/2016	18/18	Review attorney appearance and determine party representation	0.1	Vague, unnecessary
8/18/2016	18/30, 51	Review court transcripts	0.4	Vague, unnecessary, excessive
8/18/2016	18/36, 37	Draft notice and motion for additional discovery	1.0	Motion denied
	19/4, 5, 8, 11, 15, 17, 21, 26, 27, 34, 35, 38, 49	Multiple conferences / emails / telephone calls with co-counsel	3.5	Vague, excessive
	19/9, 14, 18, 22, 24, 28, 29, 36,	Multiple emails / phone calls / conferences with courtroom staff	1.0	Vague, excessive, unnecessary
3/28/2017	19/32	Review attorney appearance and determine party representation	0.1	Vague and unnecessary
	19/33, 39, 44	Review Court Orders	0.3	Vague, excessive, unnecessary
	20/13, 15, 20, 26, 27, 32, 46	Multiple "Review Court Orders"	0.7	Vague, unnecessary, excessive
	20/ 14, 22, 29, 37, 38, 39, 47, 49	Multiple emails, phone calls, conferences with co-counsel	6.3	Vague, excessive, unnecessary
	20/16, 17, 19	Legal research / memorandum of law regarding use of Keith Thornton deposition at trial	3.1	Useless motion as Plaintiffs used Keith Thornton's deposition at trial

	20/28, 30, 31,	Multiple emails with courtroom staff	0.3	Vague, excessive, unnecessary
	21/2, 3, 8, 15, 16, 22, 26	Multiple reviews of court orders, files, transcripts; legal research	3.6	Vague, excessive, unnecessary
	21/4, 5, 7, 9, 10	Multiple conferences with co-counsel	5.8	Vague, excessive, unnecessary
	21/17	Email to Shawn Smith	0.2	This witness was the subject of motions to compel and bar because unable to be served for deposition. Correspondence never produced despite counsel's assertions that she did not represent Mr. Smith at the time Defendants were attempting to serve Mr. Smith. Unnecessary as Mr. Smith did not have information relevant to Plaintiffs' claims.
	21/20, 21	Telephone call and email with courtroom staff	0.4	Excessive, vague, unnecessary
	22/3, 4, 10, 24, 27, 32, 33, 36, 37, 42	Multiple conferences / meetings / emails with co-counsel	4.4	Excessive and vague
	22/5, 6, 7, 8, 9, 13, 14, 15	Additional Motions in Limine	5.4	Motions either denied or stricken as moot
	22/20, 21, 29, 35, 43, 44	Review of requests to admit, motions regarding reading admissions at trial	9.5	Motions denied
	22/9, 14, 23, 29, 49	Multiple "review court order"	0.9	Vague, excessive, unnecessary
	22/23, 26, 28	Multiple "review deposition transcript abstracts	3.3	Vague, excessive, unnecessary

	22/12, 22, 34, 38, 41, 50	Trial preparation	11.8	Trial preparations for September 2017 trial date which was continued on Plaintiffs' motion due to Plaintiffs' illness
	23/1, 24, 26, 27, 28, 29, 39, 42, 46,	Multiple "review court order" and "review court transcript" entries	2.3	Vague, excessive, unnecessary
	23/2-3	Witness regarding defendant Valentin	0.5	Vague entry; Witness never disclosed;
	23/4, 15, 17, 38, 43, 44,	Multiple texts, emails, phone calls and conferences with co-counsel	2.3	Excessive and vague
	23/5, 6, 7, 8, 9, 11, 20, 33,	Trial preparation	7.7	Apparent trial preparations when September 2017 trial continued on Plaintiffs' motion due to Plaintiffs' illness
	23/12, 13, 14, 16, 18, 19, 21, 22	Work related to financial depositions of defendants	6.0	Plaintiffs traded punitives for costs, thus, unnecessary
	23/23	Related to motion regarding requests to admit	0.7	Motion denied
	23/34, 35, 36, 37	Draft notice and motions to file not under seal and to bar	2.5	Motions denied
	23/48, 49	Emails with courtroom staff	0.1	Vague, unnecessary
	24/3, 8, 14, 33, 39, 41, 47	Multiple entries "review court order"	0.9	Vague, excessive, unnecessary
	24/5, 22, 46,	Multiple emails and calls to courtroom staff	0.5	Vague, excessive, unnecessary
	24/6, 11, 30, 31, 34, 35, 43, 45, 49	Multiple emails, calls, conferences, meetings with co-counsel	2.1	Vague, excessive, unnecessary
11/17/2017	24/21	Trial prep	1.2	Parties had already agreed to continue December trial date
1/23/2018	24/43	Review statement regarding Valentin	0.1	Vague

	25/1, 2, 10	Review of court orders, motions to withdraw, appearances	0.4	Vague, excessive, unnecessary
	25/3, 4, 5, 6, 12, 21, 36, 37	Multiple emails, conferences, regarding trial strategy and tasks	4.2	Excessive, vague, unnecessary
	25/34, 35, 46,	Scene visit, review photographs, compare photographs	3.3	Excessive time; duplicative work
	26/1, 2, 3, 14, 18, 19, 45, 46,	Multiple emails, conferences and telephone calls with co-counsel	3.6	Excessive, vague
	26/9, 10, 11	Scene visit, photograph review, map review	3.4	Excessive time; duplicative work
	26/20, 21, 29, 30, 34, 35	Work related to motion in limine regarding lost wages and judicial notice of governmental website	5.2	Lost wages table not admitted at trial; public website information not admitted at trial
	26/48, 49, 50, 51	Work related to motion to bar Silva, Garcia, show-up	2.5	Motions denied
	27/12, 16, 22, 33, 43, 50	Multiple emails and conferences with co-counsel	3.6	Excessive, vague
	27/37, 38, 39, 40, 44, 45, 46, 47, 48, 49,	Work related to motions in limine regarding Silva and Garcia testimony, show-up testimony, chart of lost wages	8.2	Motions denied; duplicative work of motions referenced in page 26 of time and work records
7/17/2018		During jury trial counsel produced records that were not disclosed during discovery causing a delay in the trial and unnecessary sidebars	0.3	Discovery violation due to undisclosed documents resulting in wasted / delayed time during trial.
7/21/2018	27/42	Legal research regarding trial issues	0.4	Vague
	28/7, 13, 14	Multiple "review of court order"	0.4	Excessive, duplicative
	28/17, 21, 23, 30, 32, 33, 34	Multiple emails and conferences with co-counsel	1.9	Excessive, unnecessary

	28/15, 16, 18	Phone calls with courtroom deputy, witness Brown-Lawrence, and Anthony Pleas	0.8	Excessive, unnecessary; phone call to Pleas appears to be offering legal advice or counseling unrelated to the prosecution of this lawsuit
	28/38, 43	Legal research	2.3	Vague
	29/3, 5, 7, 8	Review of timesheets	13 hours	Excessive hours for task
	29/22, 23	Legal research	2.9	Vague, excessive
Total objected hours			288.5	